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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 16, 2016

16-NWP-108

Mr. Kevin W. Smith, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Mr. Mark A. Lindholm, President
and Project Manager
Washington River Protection Solutions
PO Box 850, MSIN: H3-21
Richland, Washington 99352

Re: Department of Ecology Response to Letter 16-TF-0064, Proposed Update to
Tank 241-AY-102 Monitoring Plan, Rev. 4, RPP-PLAN-60074

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Dear Mr. Smith and Mr. Lindholm:

The Department of Ecology (Ecology) reviewed your request to return to bi-weekly video inspections of the AY-102 annulus and to change the locations of those video inspections from the three known waste accumulation sites (Risers 77, 83, and 87) to just Riser 87. We also reviewed the figure submitted to revise the monitoring plan.

As set out in the AY-102 Settlement Agreement (PCHB No. 14-041c), the monitoring requirement is designed to detect potential increases in the leak rate and any new leak locations from the primary tank to secondary containment. Specifically, Section B of the Settlement Agreement states:

“12(b) Every two weeks: Conduct video inspections of all currently known waste accumulations in the Tank 241-AY-102 annulus and, as they are discovered, all newly discovered waste accumulations.”

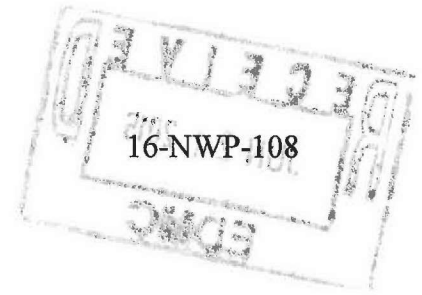
As anticipated in the operational phase Contingency Plan (RPP-PLAN-60610) approved by Ecology, the leak rate worsened during retrieval process, and the only place currently identifiable as a leak site is at Riser 87, where flow has been observed.

In light of these changed circumstances, **Ecology agrees that conducting by-weekly video inspections at Riser 87 will meet the purposes of the Settlement Agreement's video monitoring requirements.**

We acknowledge that the objective and benefit of visual inspections in the annulus has now changed from waste accumulation site tracking to investigation of potential primary tank leak pathways. Furthermore, frequent video monitoring would expose operating personnel to an unwarranted risk of radiation, contamination, and chemical vapor exposure, with limited value to be gained.



Mr. Kevin W. Smith
April 16, 2016
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In response to the increased leak rate, and pursuant to the Contingency Plan, Washington River Protection Solutions LLC increased monitoring of the AY-102 leak detection pit (LDP). Ecology requests that you continue monitoring the level in the LDP daily and the pH in the LDP weekly. We also request you to report monthly on ENRAF and continuous air monitor monitoring and other reporting requirements contained in the Settlement Agreement B.13.

Please submit the revised monitoring plan to Ecology. If you determine there are additional changes that require Ecology review, please contact us.

If you have any questions, please contact Cheryl Whalen, Cleanup Section Manager, at cheryl.whalen@ecy.wa.gov or (509) 372-7972, or Jeffery Lyon, Tank Systems Operating and Closure Project Manager, at jeff.lyon@ecy.wa.gov or (509) 372-7914.

Sincerely,

Alexandra K. Smith
Program Manager
Nuclear Waste Program

kw/aa

cc electronic:

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